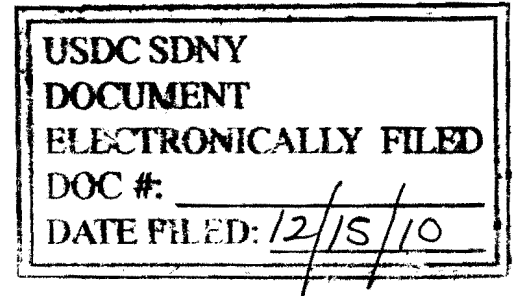


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



In re: Methyl Tertiary Butyl Ether ("MTBE")
Products Liability Litigation

MDL No. 1358
Master File C.A. No.
1:00-1898 (SAS)

This document relates to:

Orange County Water District v. Unocal Corp., et al.
04 Civ. 4968 (SAS)

~~PROPOSED~~ ORDER REGARDING DEFENDANT G&M OIL COMPANY
FACT DISCOVERY CUTOFF

On September 27, 2010, the Court granted defendant G & M Oil Co.'s motion to set aside default and directed the parties to meet and confer regarding an expedited discovery schedule. Subsequent to that order the parties have met and conferred regarding remaining discovery to be conducted by G & M Oil and plaintiff. G & M Oil has produced additional documents relating to G & M focus stations. The parties agree that any remaining discovery, whether by G&M Oil or by plaintiff, involving G&M Oil focus stations can be completed by March 1, 2011.

It is hereby ordered that fact discovery regarding G&M Oil focus stations shall close on March 1, 2011.

SO ORDERED

A handwritten signature in cursive script, likely of the court clerk, written over a horizontal line.

Dated: New York, New York
December 14, 2010

Shira A. Scheindlin
U.S.D.J.